



**STATE OF WEST VIRGINIA
DEPARTMENT OF HEALTH AND HUMAN RESOURCES**

**Bureau for Public Health
Division of STD and HIV**

**Bill J. Crouch
Cabinet Secretary**

**Rahul Gupta, MD, MPH, MBA, FACP
Commissioner
State Health Officer**

May 14, 2018

**Dr. Dominic Gaziano
Interim Health Officer
Kanawha/Charleston Health Department
108 Lee Street East
Charleston, WV 25301**

Dear Dr. Gaziano:

An evaluation of the Kanawha County Health Department's (KCHD) Harm Reduction Clinic (HRC) has been completed by staff from the West Virginia Health and Human Resources, Bureau for Public Health (WVDHHR/BPH). Based on the findings of the evaluation, the immediate suspension of the Harm Reduction Program (HRP) certification for KCHD is warranted.

In accordance with the *WV DHHR BPH Harm Reduction Program Guidelines and Certification Procedures*, rationale for the suspension is based on the following operational guidelines:

- 1.3 (p. 7) Failure to build and maintain community support for the HRC from key stakeholders such as first responders (law enforcement, fire, and EMS), businesses most impacted by the HRP site location, and city officials
- 3.2 (p. 14-15) Syringe transaction model did not sufficiently address community impact of increased syringe distribution; lack of data indicating injection drug users were consistently and routinely informed of other harm reduction services such as HIV/HBV/HCV testing and drug treatment referrals
- 5.3 (p. 27) Insufficient process monitoring (to include community stakeholders) to determine if and how well program objectives were being met and/or to reassess program goals
- 8.1.c. (p. 34) Insufficient evidence available to support the comprehensive service delivery plan met all operational requirements for certified HRPs
- 8.1.c.3 (p. 34) Insufficient evidence to support the safe recovery and disposal of used syringes and sharps waste from all HRP participants
- 8.1.e.2.c. (p. 35) Insufficient evidence regarding the total numbers and types of referrals made to drug treatment and other services

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- 8.1.f (p. 35) Failure to develop a community relations plan that records adverse incidents and concerns of local law enforcement, officials, community members and neighborhood associations which includes steps the program has taken to address those concerns

The KCHD is encouraged to reapply for certification when there is evidence to support these areas of concerns have been sufficiently addressed and protocols have been put into place to ensure the harm reduction program delivery is beneficial to its participants, first responders, and community members.

Sincerely,

A handwritten signature in blue ink, appearing to read "Elizabeth D. Coffey". The signature is fluid and cursive, with a large initial "E" and a stylized "C" at the end.

Elizabeth Coffey
BPH OEPS Harm Reduction Coordinator

cc: Tina Ramirez, KCHD HRPSSP Coordinator